

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

SAINT-GOBAIN CERAMICS AND
PLASTICS, INC.,

Plaintiff

Civil Action No.: 04-40034

v.

COORSTEK, INC.,

Defendant.

REPLY OF SAINT-GOBAIN CERAMICS AND PLASTICS, INC.

Plaintiff Saint-Gobain Ceramics and Plastics, Inc. (“Saint-Gobain”), by its counsel, answers the Counterclaims of Defendant CoorsTek, Inc. (“CoorsTek”), as follows:

1. Saint-Gobain admits that CoorsTek purports to be a corporation organized under the laws of the State of Delaware having its principal place of business in Golden, Colorado.
2. Saint-Gobain admits that, at the time of the filing of the Complaint, Saint-Gobain Ceramics and Plastics, Inc. was organized under the laws of the State of Delaware with its principal place of business in Worcester, Massachusetts.
3. Saint-Gobain admits that the Counterclaims purport to be for declaratory judgment under 28 U.S.C. § 2201 *et seq.* and for actions relating to patents under 35 U.S.C. §§ 101 *et seq.* and with subject matter jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a). Saint-Gobain denies any remaining allegations of this paragraph.
4. Saint-Gobain admits the allegations of this paragraph.
5. Saint-Gobain admits the allegations to the extent set forth above and denies any

remaining allegations of this paragraph.

6. Saint-Gobain admits that it alleges in its Complaint that CoorsTek infringes the '871 patent. Saint-Gobain denies any remaining allegations of this paragraph.

7. Saint-Gobain admits the allegations of this paragraph.

8. Saint-Gobain admits the allegations to the extent set forth above and denies any remaining allegations of this paragraph.

9. Saint-Gobain admits the allegations of this paragraph.

10. Saint-Gobain denies the allegations of this paragraph.

11. Saint-Gobain admits the allegations of this paragraph.

Respectfully submitted,

SAINT-GOBAIN INCORPORATED

Dated: September 24, 2004

by: /s/ Emily A. Berger
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